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Proposed Attorneys for John Dee Spicer, Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In Re:

A&R EXCHANGE HOLDING, LLC,

Debtor.

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§
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Case No. 25-40815-mxm7

TRUSTEE’S APPLICATION FOR EMPLOYMENT OF ATTORNEY

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON FEDERAL BUILDING, 501 W. TENTH STREET, FORT WORTH, TX 76102 BEFORE CLOSE OF BUSINESS ON MAY 13, 2025, WHICH IS TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

John Dee Spicer, Chapter 7 Trustee in the above styled and numbered case (the “Trustee” and/or “Applicant”), makes this **Trustee’s Application for Employment of Attorney** and would show the Court as follows:

1. The Trustee requires the services of an attorney for the following purposes:

- a. To advise and consult with the Trustee concerning options to pursue and obtain recovery on accounts receivable owed to the estate;
- b. To advise and consult with the Trustee concerning questions arising in the conduct of the administration of the estate and concerning the Trustee's rights and remedies with regard to the estate's assets and the claims of secured, preferred and unsecured creditors and other parties in interest;
- c. To appear for, prosecute, defend and represent the Trustee's interest in suits arising in or related to this case;
- d. To assist in the preparation of such pleadings, motions, notices and orders as are required for the orderly administration of this estate; and
- e. To investigate what means may be necessary to preserve certain property rights owned by the estate and to determine and take all necessary and reasonable actions for the preservation and/or liquidation of such assets where necessary.

2. For the foregoing and all other necessary and proper purposes, Applicant desires to retain the law firm of CAVAZOS HENDRICKS POIROT, P.C. as counsel.

3. Because the attorneys of CAVAZOS HENDRICKS POIROT, P.C. concentrate their practice in the fields of bankruptcy, corporate reorganization and debtor/creditor matters, and because of the firm's experience in those fields, Applicant feels that they are well qualified to render the foregoing services.

4. Applicant believes that said attorneys do not hold or represent any interest adverse to that of your applicant or this bankruptcy estate, and that said attorneys are disinterested persons within the meaning of 11 U.S.C. § 101(14). Attached hereto is the Rule 2014 Statement of Connections signed by Michael W. Sebesta, a shareholder of CAVAZOS HENDRICKS POIROT, P.C. Applicant is informed that the normal hourly billing rates of said attorneys range between \$420 per hour and \$575 per hour and \$100 to \$165 per hour for paraprofessional services. Said attorneys estimate their fees will range from \$8,000.00 to \$18,000.00 and it is contemplated that said attorneys will seek compensation based upon normal and usual hourly billing rates.

5. Applicant understands that said attorneys will seek compensation, both on an interim basis during the case as permitted by 11 U.S.C. § 331 and on a final basis, pursuant to 11 U.S.C. § 330.

WHEREFORE, Applicant prays that he be authorized to employ the law firm of CAVAZOS HENDRICKS POIROT, P.C. as his attorneys to render services in the areas described above, with compensation to be paid as an administrative expense in such amounts as this Court may hereinafter determine and allow.

Respectfully submitted,


John Dee Spicer, Trustee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served April 22, 2025 by electronic transmission through the Court's automated Case Management and Electronic Docketing System for the U. S. Bankruptcy Court for the Northern District of Texas on all parties-in-interest submitting to service of papers in this case by said means and via first class mail, postage prepaid on the following:

U.S. Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242-1496

A&R Exchange Holding, LLC
1501 Hall Johnson Rd #1802
Colleyville, TX 76034

Platt Richmond PLLC
1201 N. Riverfront Blvd., Suite 100
Dallas, Texas 75207

City of Fort Worth
c/o Stephen A. Cumbie
Assistant City Attorney
100 Fort Worth Trail
Fort Worth, Texas 76102

/s/ Michael W. Sebesta
Michael W. Sebesta

Michael W. Sebesta
State Bar No. 24033171
CAVAZOS HENDRICKS POIROT, P.C.
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A&R EXCHANGE HOLDING, LLC,	§	Case No. 25-40815-mxm7
	§	
Debtor.	§	
	§	

RULE 2014 STATEMENT OF CONNECTIONS

I, Michael W. Sebesta, hereby declare under penalty of perjury the following:

I am a shareholder in the law firm of Cavazos Hendricks Poirot, P.C. and have been asked to be employed as attorney for the Trustee in this case.

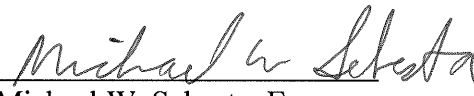
Except as disclosed below, neither I nor Cavazos Hendricks Poirot, P.C. has any known connections with the Debtor, the United States Trustee or any person employed in the office of the United States Trustee, and – to the extent heretofore identified in the filings in this case – the creditors, any other party in interest, their respective attorneys or accountants.

For purposes of disclosure, John Dee Spicer is a shareholder in the law firm of Cavazos Hendricks Poirot, P. C. As is customary, part of his arrangement with the firm is his agreement to share a portion of his earned and received Trustee fees with the firm on his Chapter 7 cases, including the above-referenced case. Additionally, should he perform legal services for the estate as a practicing attorney with this firm, his arrangement with the firm also entitles him to

compensation for a portion of the fees billed, awarded and received from the estate for the hours of service rendered. This relationship does not create any conflict between the firm and the estate but is being disclosed to ensure full compliance with Rule 2014.

For purposes of disclosure, TXU Energy Retail Company LP ("TXU Energy") is an existing client of Cavazos Hendricks Poirot, P.C. TXU Energy is listed on the mailing matrix in this case and on the Debtors' Schedule E/F as a nonpriority creditor in the amount of \$5,324.41. Cavazos Hendricks Poirot, P.C. does not represent TXU Energy in any matter related to this case. If asked, Cavazos Hendricks Poirot, P.C. will decline representation of TXU Energy with regard to this case and will advise the Trustee to engage other counsel if TXU Energy becomes adverse to any position taken by the Trustee in this case.

Dated this 22nd day of April, 2025.


Michael W. Sebesta, Esq.